



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

August 31, 2021

BY ECF

The Honorable Paul A. Crotty
United States District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Reinaldo Tirado and Raymond Diaz, 21 Cr. 480 (PAC)

Dear Judge Crotty:

The Government respectfully requests that time be excluded under the Speedy Trial Act between September 1, 2021, through the next-scheduled conference because the “ends of justice served by the granting of such continuance outweigh the best interests of the public and the defendant in a speedy trial.” 18 U.S.C. § 3161(h)(7)(A). The exclusion of time will allow the Government to complete production of discovery, allow defense counsel time to review discovery and decide what, if any, motions are to be made, and give the parties time to discuss potential resolutions of the matter. The Government consulted with defense counsel, who consent to the exclusion of time.

Respectfully submitted,

AUDREY STRAUSS
United States Attorney

by: /s/ Elizabeth A. Espinosa
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cc: Richard Rosenberg, Esq. (By ECF)
Calvin Scholar, Esq. (By ECF)

9/1/2021

A conference will be held on October 6,
2021 at 11:30 AM in courtroom 14-C.
Time will be excluded through October 6,
2021. SO ORDERED.